

December 8, 2017

VIA EMAIL

Shaun Burke
Senior Environmental Engineer
Air Enforcement Division
United States Environmental Protection Agency
1200 Pennsylvania Ave NW (MC 2242A)
Washington, DC 20460

Re: Logansport SCR Pilot Plant
Consent Decree in *United States v. Essroc Corp*, No. 2: 11-cv-650-DSC

Dear Shaun:

Lehigh Hanson ECC (Lehigh) and the Environmental Protection Agency (EPA) agreed to repeat the SCR pilot plant testing performed at our Logansport, IN facility. As you are aware, our efforts regarding this matter are moving along. We have incorporated the gas reheat and initial results seem positive. We have successfully reached 107 days of operating the SCR pilot plant.

We would like to supplement our previously submitted 60-day report regarding the status of the system. Lehigh is presenting the following additional observations and comments:

Operational Update

The SCR pilot plant had been operating effectively since our last report. Unfortunately, the air heater has suffered an unexpected setback. On or around November 6 we experienced a trip in the system, after replacing some components; the system was placed back in operation on November 8. At that time it was noticed that the system was not operating as expected and we began troubleshooting. On November 11 the system tripped yet again. During a system inspection it was noted that material, presumably from the main process, has somehow entrained within the heater elements. The accumulation caused a hot spot around the elements, particularly at one of the baffles. The hot spot burned out the heater causing the system to trip. We are currently working with the supplier to replace the heater and expect that

replacement to take place near the end of the year. Initial analysis estimates that the debris accumulated were caused by atypical condensation on the system's ductwork.



Figure 1: Accumulation on Heater Elements

NO_x Removal Update

The SCR pilot system is continuing to achieve 90% NO_x removal. The catalyst has shown no signs of decay.

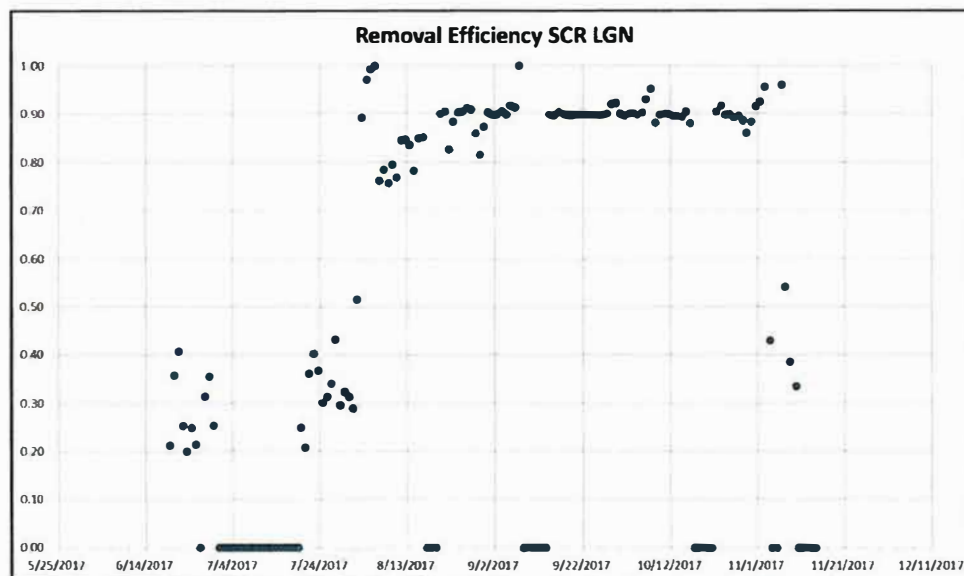


Figure 2: Pilot Test Removal Efficiency

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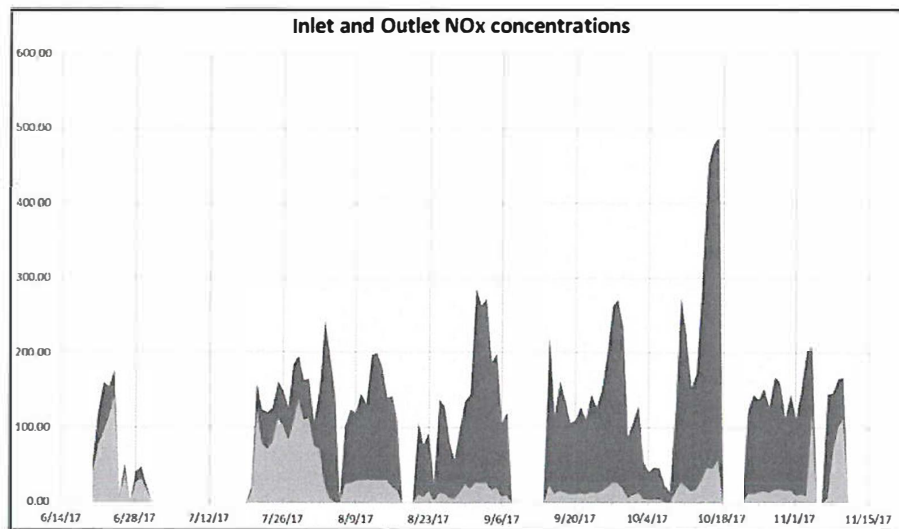


Figure 3: SCR Pilot Results Inlet NOx ppm (black) and Outlet NOx ppm (light grey)

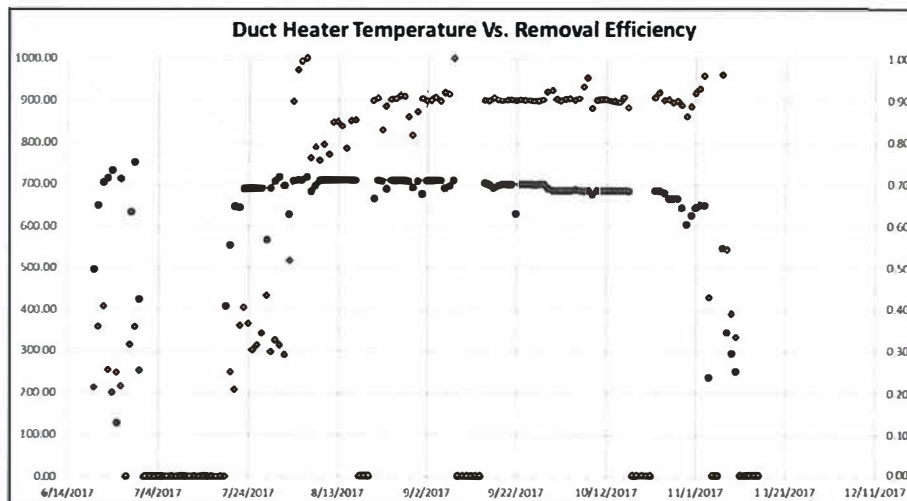


Figure 4: Correlation between system temperature(red) and removal efficiency(yellow)

Ammonia Slip Update

After the system's tuning, the ammonia slip has generally been maintained below the 10 ppm level.

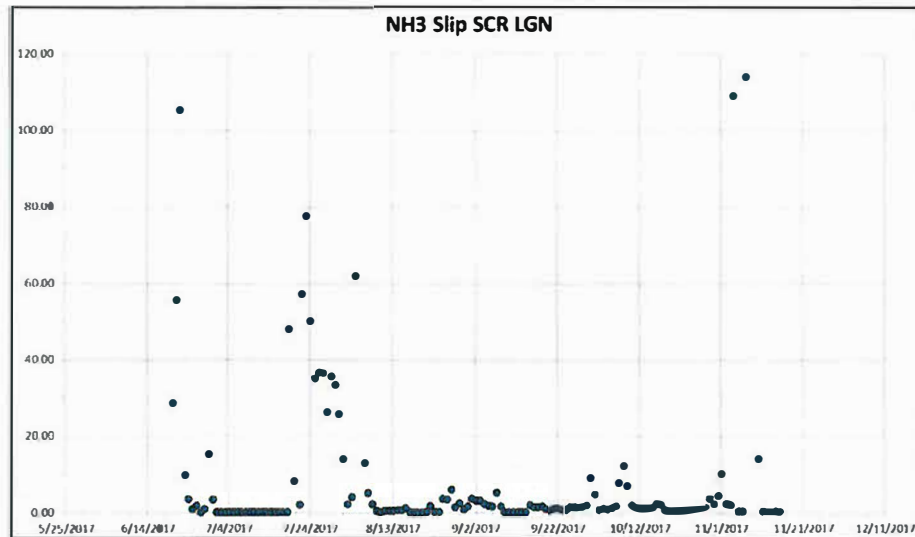


Figure 5: Ammonia Slip

Lehigh is currently working with the system's supplier to address the heater and put the system back into operation. Currently, we expect to finalize the test during January, having acquired the full data set. As previously stated, we will start working on the task of preparing the final test report once the test has been finalized.

If you have any questions regarding this communication, please contact me by telephone: 610-366-4756, or email: ShaneAlesi@lehighhanson.com.

Best Regards,

Shane Alesi
Vice President Operational Support
Heidelberg Technology Center
Division of Lehigh Cement Company LLC
HeidelbergCement Group

cc: Brian S. Montag, K&L Gates
Tom Benson, DOJ
Valerie Tachtiris, IDEM
Matt Burns, Lehigh